

***IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION AT GREENEVILLE***

IN RE:

LAKEWAY PUBLISHERS, INC.

Case No. 2:19-bk-51163-MPP

Chapter 11

Debtor.

IN RE:

**LAKEWAY PUBLISHERS OF
MISSOURI, INC.**

Case No. 2:19-bk-51164-MPP

Chapter 11

Debtor.

**SECOND MOTION TO EXTEND DEADLINE TO FILE MONTHLY OPERATING
REPORT**

NOTICE OF HEARING

Notice is hereby given that:

A hearing will be held on the Motion on August 27, 2019 at 9:00am, in the Bankruptcy Courtroom, James H. Quillen U.S. Courthouse located at 220 West Depot Street, Greeneville, TN.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you wish to have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend this hearing, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Comes now Lakeway Publishers, Inc. and Lakeway Publishers of Missouri, Inc. Debtors & Debtors in Possession, and hereby move the court for an extension to file the first two Monthly Operating Reports as required by LR-2015 for the foregoing reasons:

1. Lakeway Publishers, Inc. and Lakeway Publishers of Missouri, Inc. filed for Chapter 11 relief on May 31, 2019 and continues to serve as debtors in possession.

2. Both Debtors are engaged in the publishing business and have businesses across Tennessee, Virginia, and Missouri.

3. All business accounting operations for both Debtors are centralized with Lakeway Publishers, Inc. in Morristown, Tennessee.

4. The Debtors use a custom software program known as USS Circulation and Point of Sale which were custom made for Lakeway Publishers, Inc. Each division of Lakeway Publishers, Inc. including Lakeway Publishers of Missouri, Inc. is treated as one company and all accounting processes are integrated.

5. The Debtors are attempting to separate the accounting information for both entities in able to provide two separate reports, but the Debtors have been advised that their system will require about four weeks of programming to comply with the US Trustee Requirements.

6. Until that programming is complete, Debtors will have to engage in a lengthy and time consuming manual process to separate each transaction as required.

7. On July 30, 2019 this court heard a motion by Debtor to extend the deadlines to file the monthly operating report. The Current deadline for the first operating report is currently August 16th, and the deadline for the second report is August 30th.

8. Following the previous hearing, the Debtors have worked diligently to separate all of the business accounts to comply with the US Trustee Requirements. At the date of the filing of this motion, The Debtors will be unable to compile complete separate reports as of the new deadlines.

9. Specifically, the reconciliation of income and expenses will be incomplete, and the Debtor will be forced to file an incomplete interim report which will need to be amended. This will cause confusion among creditors, and will increase the cost to the debtors.

10. As a result, the Debtors request permission that their first operating report deadline be moved from August 16th to August 30th, and the second report moved from August 30th to

September 13. The Debtors anticipate that no additional extensions will be required after this request.

Respectfully submitted,

LAKEWAY PUBLISHERS, INC.
LAKEWAY PUBLISHERS OF MISSOURI, INC.

/s/ Ryan E. Jarrard

Ryan E. Jarrard, Esquire

BPR No. 024525

Attorney for Debtors

QUIST FITZPATRICK & JARRARD, PLLC

2121 First Tennessee Plaza

Knoxville, TN 37929-2121

865-524-1873

rej@qcflaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion, and proposed Order have been served upon the indicated parties by placing a copy thereof in the U.S. Mail, first class postage prepaid, via email or ECF this August 14, 2019:

Tiffany DiIorio VIA US Mail
800 Market Street, Suite 114
Howard J. Baker Jr. US Courthouse
Knoxville, TN 37902

Pinnacle Bank
C/O Walt Winchester
Suite 1000, First Tennessee Plaza
800 South Gay Street
Knoxville, TN 37929

Page Co-operative
Thomas H. Dickenson, Esq.
617 Main Street, P.O. Box 869,
Knoxville, TN 37901-0869

All Parties in Interest on the attached index via US Mail

/s/ Ryan E. Jarrard

ATTORNEY